

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
SANT R. HARRISON	:	VIOLATIONS:
EDWIN MOBLEY	:	18 U.S.C. § 1962(c) (racketeering -
LEROY PATTERSON	:	1 count)
JOHN E. JONES	:	18 U.S.C. § 1951(a) (extortion -
DON RUSSELL	:	62 counts)
	:	
	:	

INDICTMENT

**RACKETEERING
COUNT ONE**

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this indictment:

1. The Pennsylvania Public Utility Commission (“PUC”) was responsible for ensuring safe, reliable and reasonably priced utility service for Pennsylvania consumers by regulating public utilities and by serving as responsible stewards of competition.

2. The Motor Carrier Service and Enforcement Division of the PUC regulated motor carriers that transport property, passengers, or household goods, as well as brokers of passenger transportation, between points in Pennsylvania for compensation. The PUC’s Motor Carrier Service and Enforcement Division regulated passenger service carriers regarding rates, geographical area, customer service, safety and insurance. Taxicabs operating within the City of Philadelphia were subject to PUC regulation.

3. PUC enforcement officers conducted taxicab inspections annually and randomly throughout the year to ensure vehicles met all Pennsylvania equipment and inspection standards.

4. Defendant SANT R. HARRISON was employed by the PUC Motor Carrier Services and Enforcement Division as Manager for the Philadelphia Region.

5. Defendant EDWIN MOBLEY was employed by the PUC Motor Carrier Services and Enforcement Division as an Officer and Supervisor.

6. Defendant LEROY PATTERSON was employed by the PUC Motor Carrier Services and Enforcement Division as an Officer.

7. Defendant JOHN E. JONES was employed by the PUC Motor Carrier Services and Enforcement Division as an Officer.

8. Defendant DON RUSSELL was employed by the PUC Motor Carrier Services and Enforcement Division as an Officer.

9. As employees of the PUC, defendants SANT R. HARRISON, EDWIN MOBLEY, LEROY PATTERSON, JOHN E. JONES and DON RUSSELL were prohibited by law from using their public office for private gain and from soliciting or accepting any item of monetary value, including gifts and loans, with the intent to be influenced, from any person, firm, corporation, and other business or professional organization seeking official action from, doing business with, or whose interests may be affected by the performance of their duties.

THE RACKETEERING ENTERPRISE

10. At all times material to this indictment, the PUC's Motor Carrier Services and Enforcement Division constituted an enterprise, as that term is defined by Title 18, United States Code, Section 1961(4), that is, a legal entity, which constituted an ongoing organization

whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

11. The PUC's Motor Carrier Services and Enforcement Division engaged in, and its activities affected, interstate commerce.

12. The defendants participated in the operation and management of the enterprise as set forth in paragraphs 4 through 9.

**PURPOSE, MEANS AND METHODS
OF THE RACKETEERING ACTIVITY**

13. The purpose of the defendants' racketeering activity was to use their positions as PUC officers and managers and their authority to regulate and inspect taxicabs annually and randomly throughout the year to obtain cash payoffs.

14. Among the means and methods employed by defendants SANT R. HARRISON, EDWIN MOBLEY, LEROY PATTERSON, JOHN E. JONES and DON RUSSELL in support of defendants racketeering activity were:

a. The defendants at times received cash payoffs from taxicab company owners and representatives, whose taxicabs the defendants were responsible for inspecting;

b. The defendants at times performed incomplete inspections for taxicab companies whose representatives paid cash to them;

c. The defendants at times arranged for favorable and convenient inspection times for the taxicab companies whose representatives paid cash to them;

d. The defendants at times cancelled fines that were written to drivers for taxicab companies whose representatives paid cash to them, and;

e. The defendants at times permitted drivers who had not legitimately passed tests to receive their certifications.

15. The taxicab company representatives concealed their payoffs to the defendants either in envelopes or within their handshakes.

16. Some of the taxicab company representatives made payments to the defendants on an annual basis at the time of their inspections in amounts ranging from \$50 to \$1,000.

17. Some of the taxicab company representatives made payments to the defendants at various times throughout the year, when drivers received violations.

18. Some of the taxicab company representatives made payments to the defendants at various times throughout the year to permit drivers who had not legitimately passed tests to receive their certifications.

THE RACKETEERING VIOLATION

19. From at least as early as 1990, up to and including in or about December 2004, in the Eastern District of Pennsylvania and elsewhere, defendants

**SANT R. HARRISON,
EDWIN MOBLEY,
LEROY PATTERSON,
JOHN E. JONES, and
DON RUSSELL,**

being persons employed by and associated with the enterprise described above, namely, the PUC's Motor Carrier Services and Enforcement Division, an enterprise engaged in, and the activities of which affected interstate commerce, knowingly conducted and participated, directly and indirectly,

in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of the racketeering acts as set forth below.

THE PATTERN OF RACKETEERING ACTIVITY

_____The pattern of racketeering activity, as defined by 18 U.S.C. §§ 1961(1) and 1961(5), consisted of the following acts:

20. On or about each of the dates set forth below, in the Eastern District of Pennsylvania, the defendants listed below obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that the defendants obtained and attempted to obtain property and things of value, that is, money, more fully described below, which was not due the defendants or their office, from the persons and businesses described below, with the consent of those persons and businesses, under color of official right:

RICO ACT	DEFENDANT	DATE	PAYOR	DESCRIPTION OF PROPERTY
1	SANT R. HARRISON	12/99 - 12/03	M.H.	at least \$4,500
2	SANT R. HARRISON	1990- 2003	Menachem Reibenbach	at least \$2,600
3	SANT R. HARRISON	1995-2002	Michael Etemad	at least \$3,200
4	SANT R. HARRISON	3/7/02	Michael Etemad	\$1,000
5	SANT R. HARRISON	5/17/02	Michael Etemad	\$1,000
6	SANT R. HARRISON	6/27/02	Michael Etemad	\$1,500
7	SANT R. HARRISON	8/27/02	Michael Etemad	\$1,000
8	SANT R. HARRISON	12/20/02	Michael Etemad	\$500
9	SANT R. HARRISON	1998-2003	M.M.	at least \$3,200
10	SANT R. HARRISON	12/2000	M.M.	\$300

11	SANT R. HARRISON	12/2001	M.M.	\$300
12	SANT R. HARRISON	12/2002	M.M.	\$300
13	EDWIN MOBLEY	1995-2002	Michael Etemad	at least \$3,200
14	EDWIN MOBLEY	3/28/02	Michael Etemad	\$1,000
15	EDWIN MOBLEY	4/25/02	Michael Etemad	\$1,600
16	EDWIN MOBLEY	8/27/02	Michael Etemad	\$500
17	EDWIN MOBLEY	12/20/02	Michael Etemad	\$500
18	EDWIN MOBLEY	1996-2002	M.K.(1)	at least \$400
19	EDWIN MOBLEY	1995-2002	A.S.	at least \$500
20	LEROY PATTERSON	1998-2002	Michael Etemad	at least \$500
21	LEROY PATTERSON	1998-2002	Michael Etemad	at least \$50,000
22	LEROY PATTERSON	5/30/02	Michael Etemad	\$200
23	LEROY PATTERSON	6/27/02	Michael Etemad	\$100
24	LEROY PATTERSON	8/27/02	Michael Etemad	\$300
25	LEROY PATTERSON	11/1/02- 11/13/02	Michael Etemad	\$1,000
26	LEROY PATTERSON	11/23/02	Michael Etemad	\$500
27	LEROY PATTERSON	12/20/02	Michael Etemad	\$100
28	JOHN E. JONES	9/03/04	P.B.	\$50
29	JOHN E. JONES	9/17/04	P.B.	\$50
30	JOHN E. JONES	1995-2002	Michael Etemad	at least \$140
31	JOHN E. JONES	4/25/02	Michael Etemad	\$200
32	JOHN E. JONES	5/30/02	Michael Etemad	\$200
33	JOHN E. JONES	10/10/02	Michael Etemad	\$300
34	JOHN E. JONES	12/20/02	Michael Etemad	\$200
35	JOHN E. JONES	4/8/02	I.H.	\$25
36	JOHN E. JONES	5/14/02	I.H.	\$25

37	JOHN E. JONES	4/2/03	I.H.	\$25
38	JOHN E. JONES	6/14/04	I.H.	\$25
39	JOHN E. JONES	5/15/02	E.Y.	\$15
40	JOHN E. JONES	5/17/02	E.Y.	\$15
41	JOHN E. JONES	4/9/04	E.Y.	\$30
42	JOHN E. JONES	6/4/04	E.Y.	\$15
43	JOHN E. JONES	8/31/04	E.Y.	\$30
44	JOHN E. JONES	9/3/04	E.Y.	\$30
45	DON RUSSELL	5/1/02	P.B.	\$50
46	DON RUSSELL	3/29/04	P.B.	\$50
47	DON RUSSELL	1995-2002	Michael Etemad	at least \$160
48	DON RUSSELL	4/25/02	Michael Etemad	\$200
49	DON RUSSELL	6/27/02	Michael Etemad	\$300
50	DON RUSSELL	12/20/02	Michael Etemad	\$200
51	DON RUSSELL	2/26/02	I.H.	\$25
52	DON RUSSELL	12/17/02	I.H.	\$25
53	DON RUSSELL	7/7/03	I.H.	\$25
54	DON RUSSELL	1990-2001	A.S.	at least \$1,100
55	DON RUSSELL	6/10/02	A.S.	\$100
56	DON RUSSELL	3/19/03	A.S.	\$100
57	DON RUSSELL	6/10/02	E.Y.	\$15
58	DON RUSSELL	4/15/03	E.Y.	\$15
59	DON RUSSELL	6/30/03	E.Y.	\$15
60	DON RUSSELL	12/03	E.Y.	\$50
61	DON RUSSELL	6/4/04	E.Y.	\$15
62	DON RUSSELL	1998-2004	M.M	At least \$1,000

In violation of Title 18, United States Code, Section 1951.

All in violation of Title 18, United States Code, Section 1962(c).

COUNTS TWO THROUGH SIXTY-THREE

HOBBS ACT EXTORTION

18 U.S.C. § 1951(a)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 18 of Count One are realleged here.
2. On or about each of the dates set forth below, in the Eastern District of

Pennsylvania, defendants

**SANT R. HARRISON,
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JOHN E. JONES, and
DON RUSSELL,**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that the defendants obtained and attempted to obtain property and things of value, that is, money, more fully described below, which was not due the defendants or their office, from the persons and businesses described below, with the consent of those persons and businesses, under color of official right:

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61	DON RUSSELL	12/03	E.Y.	\$50

62	DON RUSSELL	6/4/04	E.Y.	\$15
63	DON RUSSELL	1998-2004	M.M.	at least \$1,000

All in violation of Title 18, United States Code, Section 1951(a).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY